

I, Task Force Officer (“TFO”) Robert K. Gebing, Jr., am a deputy of the Anderson County Sheriff currently assigned to the Joint Terrorism Task Force (“JTTF”) of the Federal Bureau of Investigation (“FBI”). Specifically, I am tasked with investigating criminal activity in and around the United States Capitol grounds (“the Capitol”) on January 6, 2021. As a TFO for the FBI, I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

**IDENTIFICATION OF WILLIAM GALLMAN, JOEI GALLMAN,
AND ALAN CULBERTSON
AND THEIR INVOLVEMENT IN THE EVENTS OF JANUARY 6, 2021**

According to records obtained through a search warrant that was served on Google, mobile devices associated with jwminefab@gmail.com, gallman8103@gmail.com, josiell107@gmail.com, and scottculb753@gmail.com were unlawfully present inside the U.S. Capitol on January 6, 2021.¹

Pursuant to legal process, Google provided law enforcement agents with further information for each of the above accounts. Those records revealed that:

1. The jwminefab@gmail.com account and the gallman8103@gmail.com account both used the same phone number, [REDACTED]-3690, as the recovery contact phone number in case the account user needed assistance or forgot his/her password;
2. The josiell107@gmail.com account used [REDACTED]-0201 as the recovery contact phone number for the account; and
3. The scottculb753@gmail.com account used [REDACTED]-0823 as the recovery contact phone number for the account, which was registered to “Alan Culbertson” and billed to Alan S Culbertson of [REDACTED], Laurens, South Carolina 29645.

Agents determined that Verizon Wireless provided service for both the -3690 phone number and the -0201 phone number. Pursuant to subpoenas, Verizon Wireless provided law enforcement agents with subscriber information for both of the above accounts. Those records revealed that:

1. The subscriber for the -3690 phone number is John Gallman, doing business as JW Machine Fab LLC, [REDACTED], Fountain Inn, SC; and
2. The subscriber for the -0201 phone number is John Gallman, located at the same address in Fountain Inn, SC; moreover, the -0201 account lists a business name of JW Machine Fab LLC and “JOSIE PHONE” as a contact name.

Agents determined that T-Mobile provided service for the -0823 phone number. Pursuant to a subpoena, T-Mobile provided law enforcement agents with subscriber information for the account linked to the -0823 number. Those records revealed that the -0823 number is subscribed to Alan Culbertson at the same address in South Carolina as the Google records associated with scottculb753@gmail.com.

¹ Google estimates device location using sources including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google Reports that its “maps display radius” reflects actual location of the covered device approximately 68% of the time.

Using the above subscriber information, agents searched South Carolina Department of Motor Vehicle records and found driver's license photographs of Alan Scott Culbertson, William John Wyatt Gallman, and Joei Leann Gallman. The South Carolina Department of Motor Vehicle records indicate that William Gallman, and Joei Gallman live together at the same address in Fountain Inn, South Carolina, and Alan Scott Culbertson lives at the Laurens, South Carolina address associated with his T-Mobile cell phone account.

Agents searched Facebook and found a publicly available profile for "Josie Bell Gallman." The profile picture for that account appears below:



Figure 1: Facebook profile picture for "Josie Bell Gallman"

I compared the "Josie Bell Gallman" Facebook profile picture to the South Carolina driver's license photographs of Joei Leann Gallman and William John Wyatt Gallman and determined that they show the same two people.

An FBI confidential source reviewed publicly available videos and photographs and found many images and videos showing William Gallman, Joei Gallman, and Alan Scott Culbertson together outside and inside the U.S. Capitol building on January 6, 2021. In several of the videos, people address Culbertson as "Scott," which I recognize to be his middle name.

Additionally, I reviewed footage from surveillance cameras mounted within the U.S. Capitol building, and body worn cameras (BWC) from Metropolitan Police Department (MPD) defending the U.S. Capitol on January 6, 2021, and found multiple videos and images showing William Gallman, Joei Gallman, and Alan Culbertson—separate and together—inside the U.S. Capitol building on January 6, 2021. Examples appear below in Figures 2-10.

I conducted non-custodial, voluntary interviews of William and Joei Gallman as part of my investigation. During those interviews, I showed William and Joei Gallman a screenshot from the U.S. Capitol interior surveillance footage and they admitted entering the U.S. Capitol building on January 6, 2021, walking throughout the building, and taking photographs along the way. In Figure 2 below, William Gallman identified himself as the man wearing the red hat and navy blue Carhartt sweatshirt. Joei Gallman identified herself as the woman wearing the red, white, and blue “Trump” stocking hat and the navy scarf with white stars. Joei Gallman confirmed that she commonly goes by the nickname “Josie.”

Both William and Joei Gallman identified the man facing them, the one with short gray hair and glasses, as Culbertson and described him as a friend who went with them to the rally and the U.S. Capitol building. William Gallman provided the -0823 number as Culbertson’s phone number.



Figure 2: screenshot from U.S. Capitol interior surveillance footage²

² The videos are timestamped in Universal Coordinated Time (“UTC”), which was five hours ahead of Eastern time on January 6, 2021. Accordingly, Figure 10 displays footage from 2:55:28 p.m. Eastern Standard Time.

Agents conducted a non-custodial, voluntary interview of Culbertson at his residence as part of this investigation. Culbertson admitted to traveling with the Gallmans to Washington D.C., attending the rally, entering the U.S. Capitol, and traveling throughout the building. Culbertson was shown several photographs drawn from interior U.S. Capitol surveillance footage and he identified himself in those photographs.

Collectively, Figures 3-10 trace William Gallman, Joei Gallman, and Alan Culbertson's activities on January 6, 2021.

First, the Gallmans and Culbertson attended the rally on the Ellipse, where they posed for a picture together. *See* Figure 3.

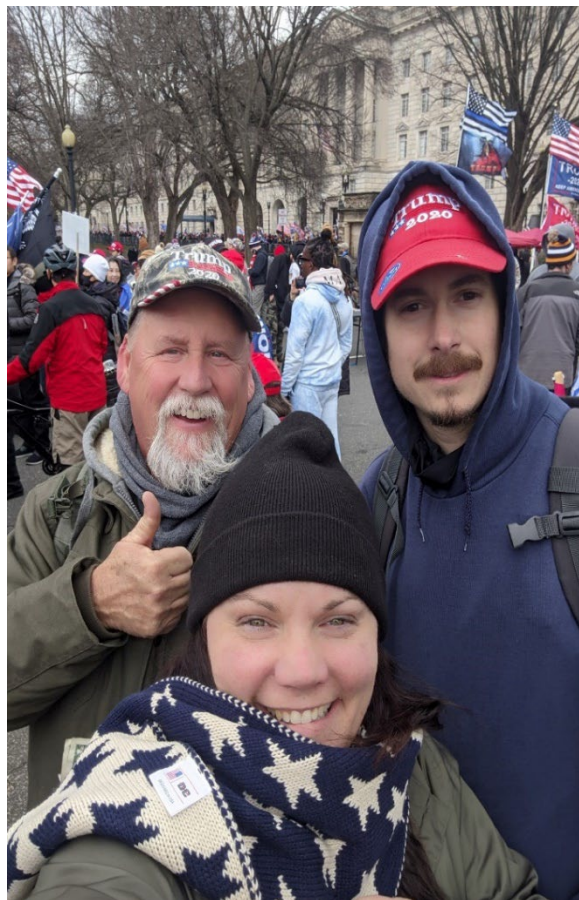


Figure 3: Photograph of Culbertson and the Gallmans at the rally from josiebell107@gmail.com.

They then proceeded to the U.S. Capitol, where they climbed to the Upper West Terrace. *See* Figure 4.

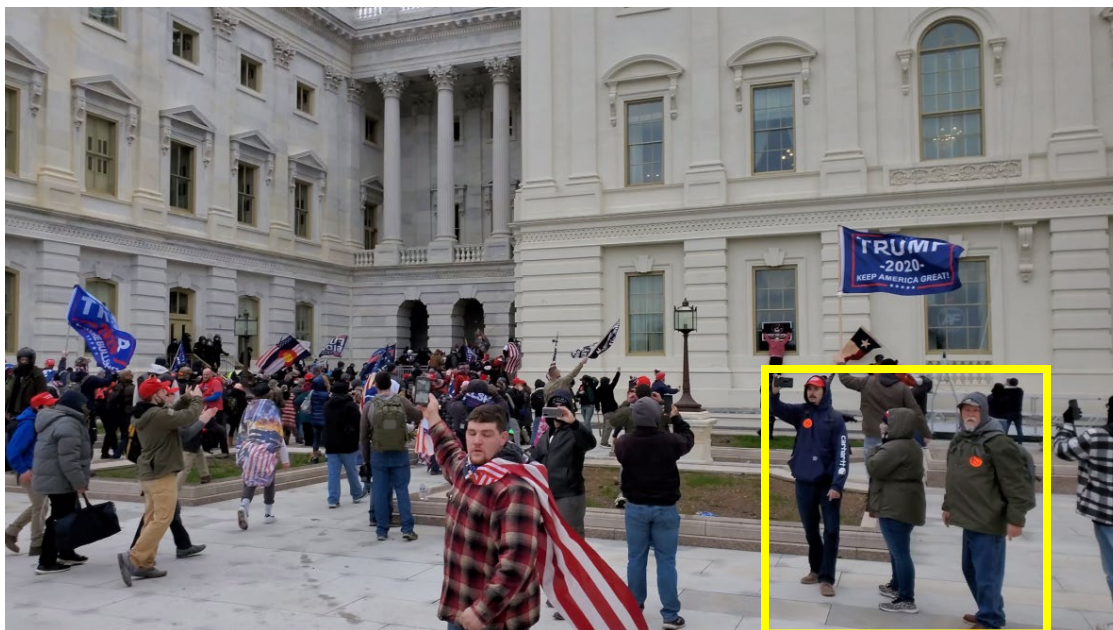


Figure 4: Gallmans and Culbertson on the Upper West Terrace from Mr Moustachio, “DC 1-6-2021 Trump Rally,” available at: <https://www.youtube.com/watch?v=BstwCcmFWHs&t=71> at 1:10 (last accessed July 15, 2022).

Interior U.S. Capitol surveillance footage shows that the Gallmans entered the U.S. Capitol building at approximately 2:20 p.m. See Figure 5.

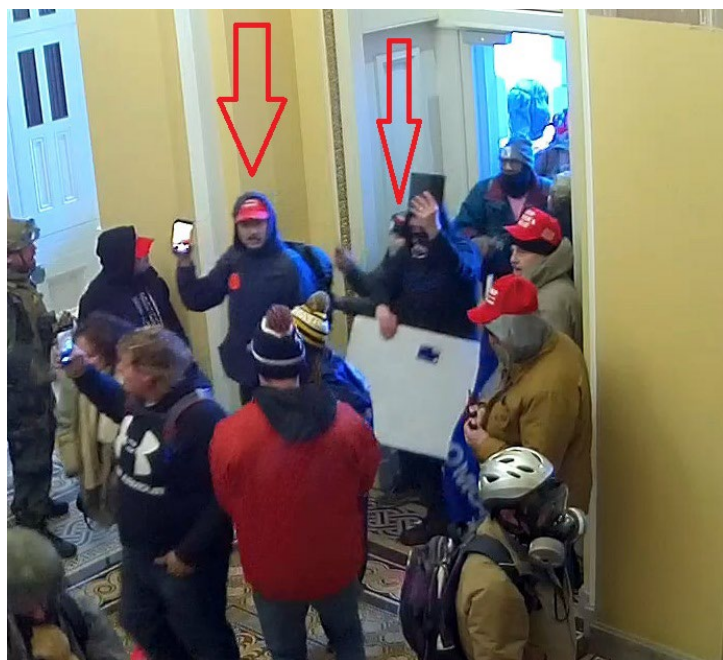


Figure 5: the Gallmans entering the U.S. Capitol building.

Culbertson entered shortly thereafter. *See* Figure 6.



Figure 6: Culbertson entering the U.S. Capitol building.

The Gallmans and Culbertson proceeded to travel throughout the U.S. Capitol building. As shown by interior U.S. Capitol building surveillance and police BWC footage, the Gallmans and Culbertson walked through the Rotunda and Statuary Hall, among other areas.

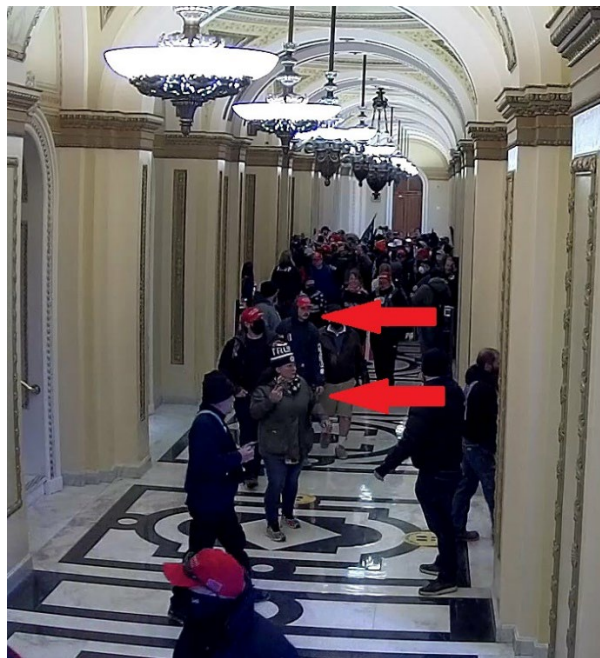


Figure 7: William and Joei Gallman walking a hallway within the U.S. Capitol building.

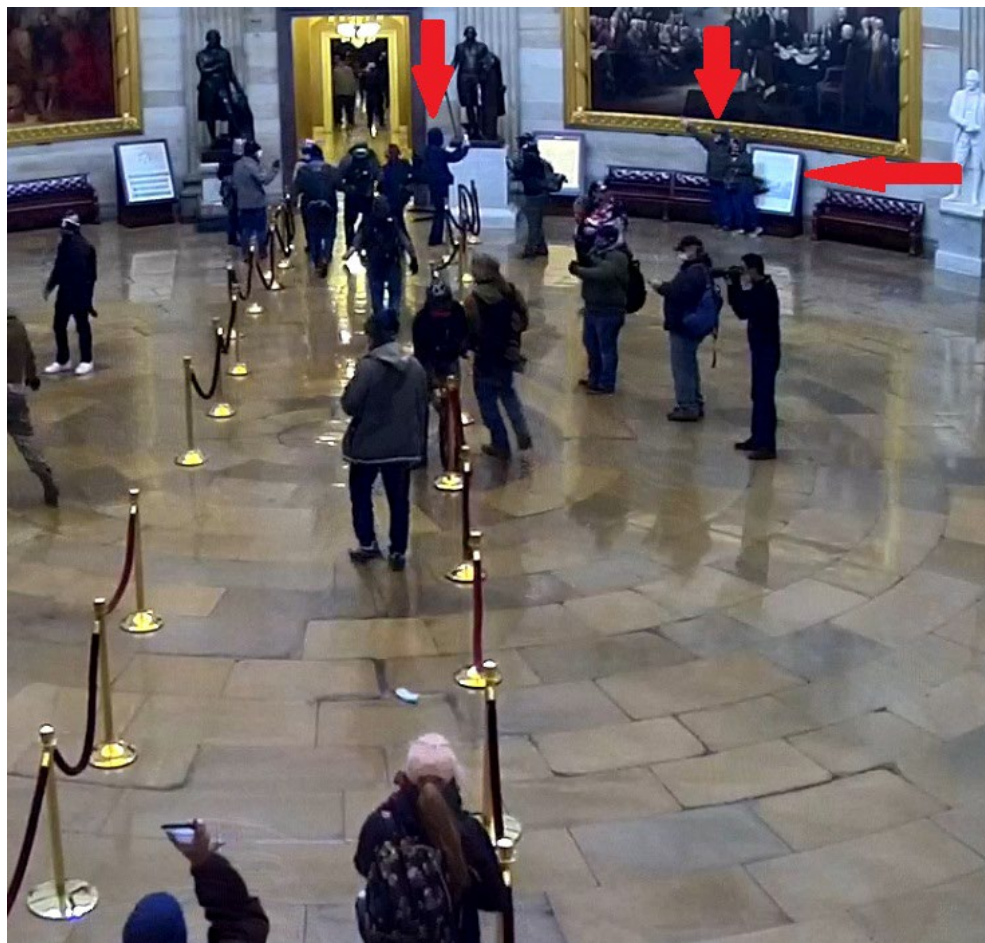


Figure 8: the Gallmans and Culbertson inside the Rotunda of the U.S. Capitol building.

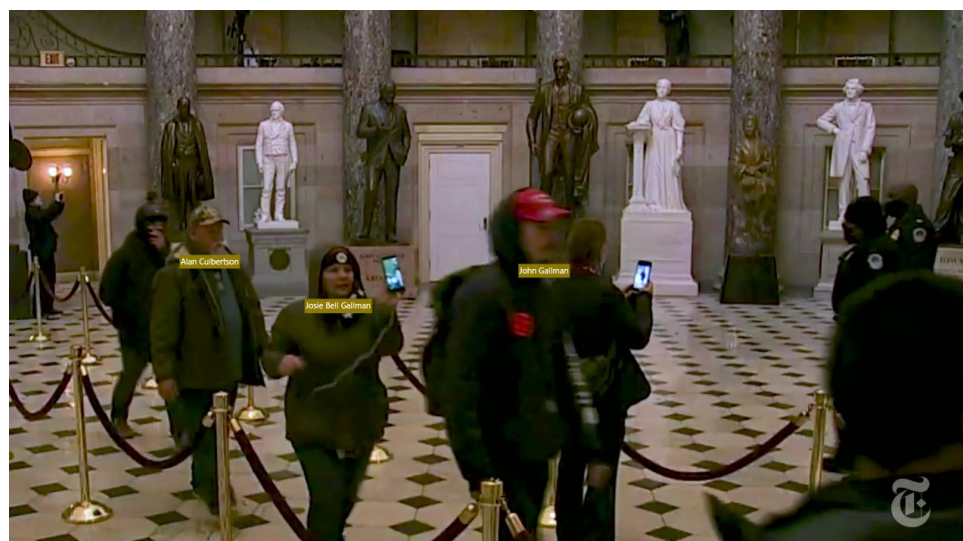


Figure 9: the Gallmans and Culbertson inside Statuary Hall.

At approximately 2:55 p.m., after spending approximately 25 minutes inside, the Gallmans and Culbertson exited the U.S. Capitol building. See Figure 10; see also Figure 2 *supra*.



Figure 10: the Gallmans and Culbertson exiting the U.S. Capitol building.

Federal agents met a second time with both William Gallman and Culbertson at their respective residences. At these meetings, William Gallman and Culbertson allowed agents to photograph items of clothing that the Gallmans and Culbertson wore on January 6, 2021, and which appear in the photographs above. Figures 11 and 12 depict the shirt and jacket Culbertson wore and provided to agents.



Figure 11



Figure 12

Figures 13 and 14 show the navy blue Carhartt sweatshirt worn by William Gallman on January 6, 2021, and the red, white, and blue “Trump” hat worn by his wife, Joei Gallman, both of which were provided to the agents by William Gallman.



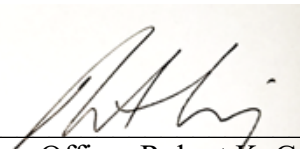
Figure 13



Figure 14

Based on the foregoing, there is probable cause to believe that WILLIAM GALLMAN, JOEI GALLMAN, and ALAN CULBERTSON violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of 18 U.S.C. § 1752, a “restricted building” includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Additionally, there is probable cause to believe that WILLIAM GALLMAN, JOEI GALLMAN, and ALAN CULBERTSON violated 40 U.S.C. § 5104(e)(2)(D) and (G), which make it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (G) parade, demonstrate, or picket in any of the Capitol Buildings.



Task Force Officer Robert K. Gebing
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone, this 16th day of September.

HONORABLE G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE